

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

SALLY CANNON, On Behalf of Herself and All)
Others Similarly Situated,)

Plaintiff,)

v.)

MBNA CORPORATION, PENSION & 401K)
PLAN COMMITTEE of MBNA CORPORATION,)
LANCE L. WEAVER, VERNON H.C. WRIGHT,)
RANDOLPH D. LERNER, BRUCE L.)
HAMMONDS, JAMES H. BERICK, BENJAMIN)
R. CIVILETTI, WILLIAM L. JEWS, STUART L.)
MARKOWITZ, WILLIAM B. MILSTEAD, JOHN)
COCHRAN, THOMAS G. MURDOUGH, Jr. and)
DWIGHT ASSET MANAGEMENT COMPANY,)

Defendants.)

C.A. No. 05-429 (GMS)

**MOTION FOR CONSOLIDATION AND APPOINTMENT OF INTERIM
CLASS COUNSEL AND LIAISON COUNSEL
AND EXECUTIVE COMMITTEE IN THE ERISA LITIGATION**

Plaintiff and class member Sally Cannon hereby moves this Court for an Order which:

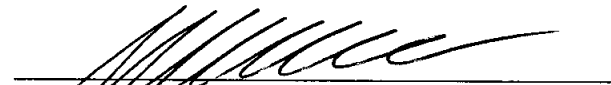
(a) pursuant to Fed.R.Civ.P. 42(a), consolidates this action with any related ERISA cases that are subsequently filed or removed or transferred to this Court; and

(b) pursuant to Fed.R.Civ.R. 23(g)(2)(A), appoints Wolf Haldenstein Adler Freeman & Herz LLP as interim class counsel, appoints Rosenthal, Monhait, Gross & Goddess, P.A. as interim liaison counsel, and creates an Executive Committee of counsel consisting of the law firms of Wolf Haldenstein Adler Freeman & Herz LLP, Goodkind Labaton Rudoff & Sucharow LLP, and Gainey & McKenna, to act on behalf of the putative class.

In support of her motion, plaintiff Cannon submits the accompanying Memorandum of Law and the Declarations of Mark C. Rifkin, Thomas J. McKenna, Christopher J. Keller and Jeffrey S. Goddess.

Defendants take no position with respect to this motion. (Stipulation, D.I. 19.)

DATED: September 14, 2005



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CERTIFICATE OF SERVICE

I hereby certify that on September 14, 2005, I electronically the foregoing document using CM/ECF, which will send notification of such filing to the following:

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